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Attorneys for Interested Parties Alex Fontenot,

Mya Hollingshed, Sarah Fuller, Deontay Anderson, and Tucker Clark

(and the *Fontenot* putative class)

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION**

IN RE COLLEGE ATHLETE NIL  
LITIGATION

CASE NO. 4:20-cv-3919-CW

**DECLARATION OF GARRETT R.  
BROSHUIS IN SUPPORT OF  
INTERESTED PARTIES' OPPOSITION  
TO PLAINTIFFS' UNOPPOSED  
ADMINISTRATIVE  
MOTION TO SHORTEN TIME  
PURSUANT TO CIVIL LOCAL RULE  
6-3 FOR THE HEARING ON  
PLAINTIFFS' UNOPPOSED MOTION  
FOR PRELIMINARY APPROVAL OF  
CLASS ACTION SETTLEMENT**

Hon. Claudia Wilken

No. 4:20-cv-3919-CW

**DECLARATION OF GARRETT R. BROSHUIS**

1 I, GARRETT R. BROSHUIS, declare as follows:

2 1. I am an attorney and an active member of the State Bar of California (Bar No.  
3 329924). I am a partner at Korein Tillery, LLC and counsel for Alex Fontenot, Mya Hollingshed,  
4 Sarah Fuller, Deontay Anderson, and Tucker Clark (the “Interested Parties”), who are plaintiffs in  
5 related litigation, *Fontenot v. National Collegiate Athletic Association*, No. 1:23-cv-03076-CNS-  
6 STV (D. Colo. Nov. 20, 2023), and members of the settlement class in this action.

7 2. I submit this declaration in support of the Interested Parties’ Opposition to Plaintiffs’  
8 Unopposed Administrative Motion to Shorten Time Pursuant to Civil Local Rule 6-3 for the Hearing  
9 on Plaintiffs’ Unopposed Motion for Preliminary Approval of Class Action Settlement (ECF No.  
10 451). I am personally familiar with the facts set forth in this declaration and, if called as a witness,  
11 I could and would competently testify to the matters stated herein.

12 3. Counsel for the Interested Parties was not consulted prior to the filing of Plaintiffs’  
13 Unopposed Administrative Motion to Shorten Time Pursuant to Civil Local Rule 6-3 for the Hearing  
14 on Plaintiffs’ Unopposed Motion for Preliminary Approval of Class Action Settlement.

15 4. Counsel for the Interested Parties is still in the process of analyzing the documents  
16 filed in this matter on Friday, July 26, 2024, including the proposed settlement and supporting  
17 materials.

18 5. Counsel for the Interested Parties believes adequate time is necessary to properly  
19 evaluate the proposed settlement, determine whether a response is called for, and if so, to prepare  
20 that response.

21 6. Counsel for the Interested Parties has heard from other groups representing athletes  
22 within the settlement class that they are similarly still evaluating Plaintiffs’ filings in this matter and  
23 that they may file separate responses to the motion for preliminary settlement approval as well.

24 7. The alternative dates proposed by Plaintiffs for the hearing on the motion for  
25 preliminary settlement approval would require the undersigned counsel to attempt to reschedule  
26 other commitments. Some of those commitments are not moveable, including funeral proceedings

1 for a close family member that overlap with some of the dates offered, a previously scheduled  
2 hearing on one of the offered dates, and a trial involving key team members that will take place in  
3 August and that overlaps with the offered dates. However, undersigned counsel is available to  
4 participate in the hearing on Plaintiffs' Motion for Preliminary Approval of Class Action Settlement  
5 on September 5, as currently scheduled.

6 I declare under penalty of perjury that the foregoing is true and correct.

7 Executed on July 31, 2024 in St. Louis, Missouri.

8  
9 

10  
11 \_\_\_\_\_  
Garrett R. Broshuis

**CERTIFICATE OF SERVICE**

I hereby certify that on July 31, 2024, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all attorneys of record registered for electronic filing.

/s/ Garrett R. Broshuis

Garrett R. Broshuis